

December 21, 2017

Meredith Kurpius, Ph.D.
Associate Air Director
Air Quality Analysis Office
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street, AIR-7
San Francisco, California 94105

Dear Dr. Kurpius:

The California Air Resources Board requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the documents accompanying this request support the flagging of PM₁₀ exceedances in the Imperial County Air Pollution Control District as natural events due to high winds. The values recorded at the affected monitors have implications on the PM₁₀ nonattainment designation of Imperial County.

The PM₁₀ exceedances occurred on:

- February 28, 2014;
- March 17, 2014;
- March 30-April 1, 2014;
- April 24, 2015; and
- May 7, 2015.

Unusually high PM₁₀ concentrations, exceeding the 24-hour federal design value of 150 µg/m³, were recorded at various monitoring sites in the Imperial County Air Pollution Control District on the dates listed above. The analyses and data presented in the accompanying documents show that without the high winds and entrained dust on each of these occurrences, concentrations measured at the monitoring sites would have been below the federal standard.

On March 22, 2007, the U.S. EPA adopted the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (72 FR 13560). This rule, which was revised on October 3, 2016 (81 FR 68216),

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requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

If you have any questions regarding the enclosed documentation please contact Mr. Webster Tasat, Manager, Central Valley Air Quality Planning Section, at (916) 323-4950 or via email at webster.tasat@arb.ca.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sylvia Vanderspek", with a long, sweeping horizontal flourish extending to the right.

Sylvia Vanderspek, Chief
Air Quality Planning Branch
Air Quality Planning and Science Division

Enclosure

cc: Mr. Matt Dessert
Air Pollution Control Officer
Imperial County Air Pollution Control District
150 South Ninth Street
El Centro, California 92243-2850

Mr. Webster Tasat, Manager
Central Valley Air Quality Planning Section
Air Quality Planning and Science Division